

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|  |   |                            |
|--|---|----------------------------|
| INTERNATIONAL BUSINESS MACHINES CORPORATION, | ) |                            |
|  | ) |                            |
|  | ) |                            |
| Plaintiff,                                   | ) | C.A. No. 16-122-LPS-CJB    |
|  | ) |                            |
| v.   | ) | <b>JURY TRIAL DEMANDED</b> |
|  | ) |                            |
| GROUPON, INC.                                | ) |                            |
|  | ) |                            |
| Defendant.                                   | ) |                            |

**NOTICE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of the following document was caused to be served on November 2, 2016, upon the following attorneys of record as indicated below:

PLAINTIFF'S INITIAL DISCLOSURES PURSUANT TO PARAGRAPH 3  
OF THE COURT'S DEFAULT STANDARD FOR DISCOVERY  
[HIGHLY CONFIDENTIAL -ATTORNEYS' EYES ONLY]

**VIA ELECTRONIC MAIL**

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Dated: November 2, 2016  
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